

Message Text

LIMITED OFFICIAL USE

PAGE 01 LONDON 00863 171845Z
ACTION EB-08

INFO OCT-01 EUR-12 ISO-00 SS-15 COME-00 L-03 CIAE-00
DODE-00 INR-07 NSAE-00 PA-01 USIA-06 PRS-01 SP-02
/056 W

-----032923 180252Z /41

R 171823Z JAN 78
FM AMEMBASSY LONDON
TO SECSTATE WASHDC 2116
TREASURY DEPT WASHDC

LIMITED OFFICIAL USE LONDON 00863

TREASURY FOR DAVID ROSENBLOOM OR STEVEN HANNES, OFFICE
OF INTERNATIONAL TAX COUNSEL.

E.O. 11652: N/A
TAGS: EFIN, UK
SUBJECT: NEW IRS RULINGS ON TAX CREDITS FOR U.S. COMPAN-
IES OPERATING IN CERTAIN COUNTRIES

REF: STATE 11565

1. EMBASSY WOULD APPRECIATE GUIDANCE ON HOW TO REPLY TO
QUERIES CONCERNING POTENTIAL IMPACT OF NEW IRS RULINGS
ON TAX CREDITS ON OPERATION OF U.S. COMPANIES IN UK, WITH
SPECIFIC REFERENCES, INTER ALIA, TO NORTH SEA OPERATIONS
AND PETROLEUM REVENUE TAX. IF POSSIBLE, A 2 OR 3 PARA-
GRAPH REPLY FOR USE WITH PRESS, U.S. BUSINESS COMMUNITY,
UK GOVERNMENT OFFICIALS IS REQUESTED ASAP.

BREWSTER

LIMITED OFFICIAL USE

NNN

Message Attributes

Automatic Decaptioning: X
Capture Date: 01 jan 1994
Channel Indicators: n/a
Current Classification: UNCLASSIFIED
Concepts: CREDIT, FOREIGN INVESTMENTS, TAXES
Control Number: n/a
Copy: SINGLE
Draft Date: 17 jan 1978
Decaption Date: 01 jan 1960
Decaption Note:
Disposition Action: RELEASED
Disposition Approved on Date:
Disposition Case Number: n/a
Disposition Comment: 25 YEAR REVIEW
Disposition Date: 20 Mar 2014
Disposition Event:
Disposition History: n/a
Disposition Reason:
Disposition Remarks:
Document Number: 1978LONDON00863
Document Source: CORE
Document Unique ID: 00
Drafter: n/a
Enclosure: n/a
Executive Order: N/A
Errors: N/A
Expiration:
Film Number: D780025-0981
Format: TEL
From: LONDON
Handling Restrictions: n/a
Image Path:
ISecure: 1
Legacy Key: link1978/newtext/t19780156/aaaabusw.tel
Line Count: 44
Litigation Code IDs:
Litigation Codes:
Litigation History:
Locator: TEXT ON-LINE, ON MICROFILM
Message ID: e4cfcfe2-c288-dd11-92da-001cc4696bcc
Office: ACTION EB
Original Classification: LIMITED OFFICIAL USE
Original Handling Restrictions: n/a
Original Previous Classification: n/a
Original Previous Handling Restrictions: n/a
Page Count: 1
Previous Channel Indicators: n/a
Previous Classification: LIMITED OFFICIAL USE
Previous Handling Restrictions: n/a
Reference: 78 STATE 11565
Retention: 0
Review Action: RELEASED, APPROVED
Review Content Flags:
Review Date: 05 may 2005
Review Event:
Review Exemptions: n/a
Review Media Identifier:
Review Release Date: N/A
Review Release Event: n/a
Review Transfer Date:
Review Withdrawn Fields: n/a
SAS ID: 3763575
Secure: OPEN
Status: NATIVE
Subject: NEW IRS RULINGS ON TAX CREDITS FOR U.S. COMPAN- IES OPERATING IN CERTAIN COUNTRIES
TAGS: EFIN, UK
To: STATE TRSY
Type: TE
vdkgvwkey: odb://SAS/SAS.dbo.SAS_Docs/e4cfcfe2-c288-dd11-92da-001cc4696bcc
Review Markings:
Sheryl P. Walter
Declassified/Released
US Department of State
EO Systematic Review
20 Mar 2014
Markings: Sheryl P. Walter Declassified/Released US Department of State EO Systematic Review 20 Mar 2014